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Attorneys for Defendant
LEFRAK ORGANIZATION, INC.

IN RE: WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEDRO GARCIA and GLADYS GARCIA,

Case No.:
07-CV-5702

Plaintiffs,

-against-

CITY OF NEW YORK, BANKERS TRUST
COMPANY, DEUTSCHE BANK TRUST COMPANY
AMERICAS, DEUTSCHE BANK TRUST
COMPANY, DEUTSCHE BANK TRUST
CORPORATION, THE BANK OF NEW YORK
TRUST COMPANY NA, TISHMAN INTERIORS
CORPORATION and BT PRIVATE CLIENTS CORP.,
TULLY CONSTRUCTION CO., INC., TULLY
INDUSTRIES, VERIZON NEW YORK, INC., NEW
YORK TELEPHONE COMPANY, EMPIRE STATE
PROPERTIES, INC. and LEFRAK ORGANIZATION
INC.,

**NOTICE OF ADOPTION OF
ANSWER TO MASTER
COMPLAINT OF LEFRAK
ORGANIZATION, INC.**

Defendants.

PLEASE TAKE NOTICE THAT defendant, LEFRAK ORGANIZATION, INC., as
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts
its Verified Master Answer dated July 30, 2007, which was filed in the matter of *In Re: World*

Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (§ J(2)).

WHEREFORE, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
September 24, 2007

Yours etc.,

HARRIS BEACH PLLC



Brian A. Bender, Esq. (BAB-0218)

HARRIS BEACH PLLC

Attorney for Defendant

LEFRAK ORGANIZATION, INC.

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